

EXHIBIT 1

FACTORYING CRITERIA FOR RIFLED BARREL WEAPONS WITH
NOSS (Shoulder) Community, referred to as "Shoulder Weapons"

SUMMARY: This chart lists the factors ATF considers when evaluating a firearm with an accessory (commonly referred to as a "stabilizing brace") for classification under the National Firearms Act (NFA) or the Gun Control Act (GCA).

NOTE: The Bureau of Alcohol, Tobacco, Firearms and Explosives reserves the right to preclude classification as a pistol with a "stabilizing brace" for any firearm that achieves an apparent qualifying score but is an attempt to make a "short-barreled rifle" and circumvent the GCA or NFA.

*As used in this worksheet, the term "accessory" is intended as a general term to describe the marketing of items commonly known as "stabilizing braces" and does not affect any ATF determinations whether such items when attached to a handgun are, in fact, "accessories" not necessary for the operation of the handgun, but which enhance its usefulness or effectiveness, or whether they are component parts necessary to properly operate a weapon, such as a rifle. Furthermore, use of that term does not affect any determinations whether such items are "defense articles" under the Arms Export Control Act. Please direct all inquiries as to possible liability for the firearms and ammunition excise tax, 26 U.S.C. sections 4181-4182 to the United States Department of Treasury, Alcohol and Tobacco Tax and Trade Bureau (TTB).

Weapon:		Explanation:	
Manufacturer/Model			
SECTION I - PREREQUISITES		[Suitability of "Brace" use]	
1. The weapon must weigh at least 64 ounces.		* Weighed with magazine - unloaded / accessories removed	
2. The weapon must have an overall length between 12 and 26 inches.		* Length measured with all non-operational accessories removed	
Weapon must meet both Prerequisites in order to proceed to Section II.			
INDIVIDUAL CHARACTERISTICS	POINT VALUE	POINT SUB TOTAL	
SECTION II - Accessory Characteristics		[Determination of use as a "Brace" vs. Stock]	
ACCESSORY DESIGN			
Not based on a known shoulder stock design	0		
Incorporates shoulder stock design feature(s)	1		
Based on a known shoulder stock design	2		
REAR SURFACE AREA			
Device incorporates features to prevent use as a shouldering device	0		
Minimized Rear Surface lacking features to discourage shouldering	1		
Rear Surface useful for shouldering the firearm	2		
Material added to increase Rear Surface for shouldering	3		
ADJUSTABILITY			
Non-adjustable, fixed design	0		
Adjustable or telescoping attachment designed for shouldering	2		
STABILIZING SUPPORT			
Counterbalance Design - Non-Folding	0		
Counterbalance Design that Folds creating Rear Contact Surface	1		
OR:			
"Fin-type" design WITH Arm Strap	0		
"Fin-type" design WITHOUT Arm Strap	2		
OR:			
"Cuff-type" design that FULLY wraps around arm	0		
"Cuff-type" design that PARTIALLY wraps around arm	1		
"Cuff-type" design that FAILS to wrap around arm	2		
"Split-stock" configuration not designed to wrap around shooter's arm	3		
SECTION II SCORE ACHIEVED:		SCORE	
Section II Must Score LESS than 4 in order to proceed to Section III			

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SECTION III - Configuration of Weapon		[Determination if weapon is shoulder fired]	
LENGTH OF PULL - w/Accessory in Rear most "Locked Position"			
Less than 10-1/2 Inches	0	* Measured from the center of the trigger to the center of the shoulder device / "stabilizing brace"	
10-1/2 but under 11-1/2 Inches	1		
11-1/2 but under 12-1/2 Inches	2		
12-1/2 but under 13-1/2 Inches	3		
13-1/2 Inches and Over	4		
ATTACHMENT METHOD			
Standard AR-type Pistol Buffer Tube (6-6-1/2 Inches)	0		
AR-type Pistol Buffer Tube with Adjustment Notches (KAR-type)	1		
Adjustable Rifle Buffer Tube	1		
Adjustable PDW-type guide rails	1		
Extended AR-type Pistol Buffer Tube	2		
Inclusion of Folding Adapter extending length of pull	2		
Use of "Spacers" to extend length of pull	2		
Modified shoulder stock with rear replaced by "stabilizing brace"	3		
Attachment method creates an unusable aim-point (slant)	3		
"STABILIZING BRACE" MODIFICATIONS / CONFIGURATION			
"Cuff-type" or "fin-type" design with strap too short to function	2		
"Cuff-type" or "fin-type" design with strap made out of elastic material	2		
"Fin-type" lacking an arm strap	2		
"Cuff-type" design with strap REMOVED	4		
"Brace" accessory modified for shouldering	4		
Modified Shoulder Stock (originally a Shoulder Stock)	4		
PERIPHERAL ACCESSORIES			
Presence of a Hand Stop	2		
Presence of a Secondary Grip (indicating two-handed fire)	4		
Presence of Rifle-type Back-up / Flip-up Sights / Or no sights	1		
Presence of Reflex Sight with FTS Magnifier w/ Limited Eye-Relief	2		
Presence of a Sight/Scope with Eye Relief Incompatible with one-handed fire	4		
Presence of a bipod / monopod	2		
Weapon as configured weighing more than 120 ounces	4	* Weighed with magazine - unloaded	
SECTION III SCORE ACHIEVED:		SCORE	
(A SCORE OF 4 POINTS OR MORE INDICATES A SHOULDER-FIRED DESIGN)			
CLASSIFICATION:		Rifle or "Braced" Handgun	

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